

FLOOD & FLOOD

ATTORNEYS AT LAW

914 PRESTON AT MAIN, SUITE 800

HOUSTON, TEXAS 77002-1832

TELEPHONE (713) 223-8877

FACSIMILE (713) 223-8879

CHRIS FLOOD
CHARLES FLOOD

July 29, 2022

By ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *United States of America v. Donal O’Sullivan, et al.*;
 Case No. 1:20-cr-00272-PKC; In the United States District
 Court for the Eastern District of New York, Brooklyn
 Division.**

Dear Judge Chen:

I represent the defendant Helen O’Sullivan in the above referenced matter. This letter motion is to request a modification of Ms. O’Sullivan’s bail conditions to grant her travel to Ireland.

Ms. O’Sullivan is requesting to modify her bail conditions for permission to travel outside the United States to Ireland beginning August 4, 2022 and returning August 28, 2022 for the purpose of visiting her mother, Teresa O’Sullivan. Ms. Helen O’Sullivan also plans to visit her Aunt Kitty who is 101 years old and despite an earlier belief that she would not survive is in poor health. The elder Ms. O’Sullivan resides at Coom, Ballinskelligs, Co. Kerry. V23YD39; the telephone number is 011 353 066-9479245. Ms. O’Sullivan plans to remain at her mother’s home for the duration of her visit to Ireland.

As this Court well knows, this may be Ms. O’Sullivan’s last chance to visit her mother and see her aunt before her sentencing scheduled October 24, 2022.

The Honorable Pamela K. Chen
July 29, 2022
Page 2

I have conferred with Assistant U.S. Attorney Turner Buford regarding this request. Mr. Buford informed me that the United States consents to this request.

Helen O'Sullivan respectfully requests the Court grant her permission to travel to Ireland and will forward travel arrangements once travel is granted.

Upon approval by the Court, Ms. O'Sullivan will apply for an emergency travel passport as Defendant's most recent passport expired February 2022. After her return entry to the United States, Ms. O'Sullivan will arrange to return her passport to the government as previously ordered by the Court.

Respectfully submitted,

/s/ Chris Flood

Chris Flood
Attorney for Defendant,
Helen O'Sullivan

CF:ms

c: All counsel of record (by ECF)